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Southwestern Bell Corporation, Washington, Inc.

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March 5, 1993

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MAR 5 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

William A. Blase, Jr.
Director
Federal Regulatory

Ex Parte

Ms. Donna Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: CC Docket No. 92-77, Phase I

Dear Ms. Searcy:

In accordance with Commission rules governing ex parte presentations, please be advised that, today, Don Little, Mark Schwarz and the undersigned met with Linda Oliver, Legal Advisor to Commissioner Duggan regarding issues raised in Southwestern Bell's Petition for Reconsideration in CC Docket No. 92-77, Phase I. Attached is a handout provided in the meeting.

If you have any questions, please let me know.

Sincerely,

William A. Blase, Jr.

Attachment

cc: Linda Oliver
Cheryl Tritt
Kathleen Levitz

Colleen Boothby
Barbara Esbin

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Suite 1000
Washington, DC 20006

Phone 202 293-8560

0+ PUBLIC DOMAIN (92-77 - PHASE I)

- **DEFINITION**

- "any carrier issuing a calling card designed to be used with "0+" access would be required to also provide validation and billing service for any other carrier wishing to accept that card" (i.e., "0+" cards would be in the "public domain").

- **COMMISSION DECISIONS**

- Did not require 0+ Public Domain Implementation
- Ordered AT&T to instruct its card customers to dial calls using 10288+0 access

0+ PUBLIC DOMAIN (92-77 - PHASE I) (Cont'd)

- **IMPACTS**

- Commission Actions Produce Same Effects as Implementation of 0+ Public Domain Without Requiring 0+ IXC Card Issuers To Make Data Available
- Customer Confusion
- Negative Impacts to Mutual Card Honoring Arrangements
- Customer Dissatisfaction/Confusion

- **SWBT PFR**

- Requests Commission to Modify its Instructions to AT&T Regarding Customer Education Materials
 - ▲ Telephone must not be presubscribed to AT&T in order to Bill Local and IntraLATA Calls to AT&T Cards
 - ▲ Customer Need Not Only Listen for "AT&T" in order to place Local and IntraLATA Calls

FCC
CC Docket No.
92-77

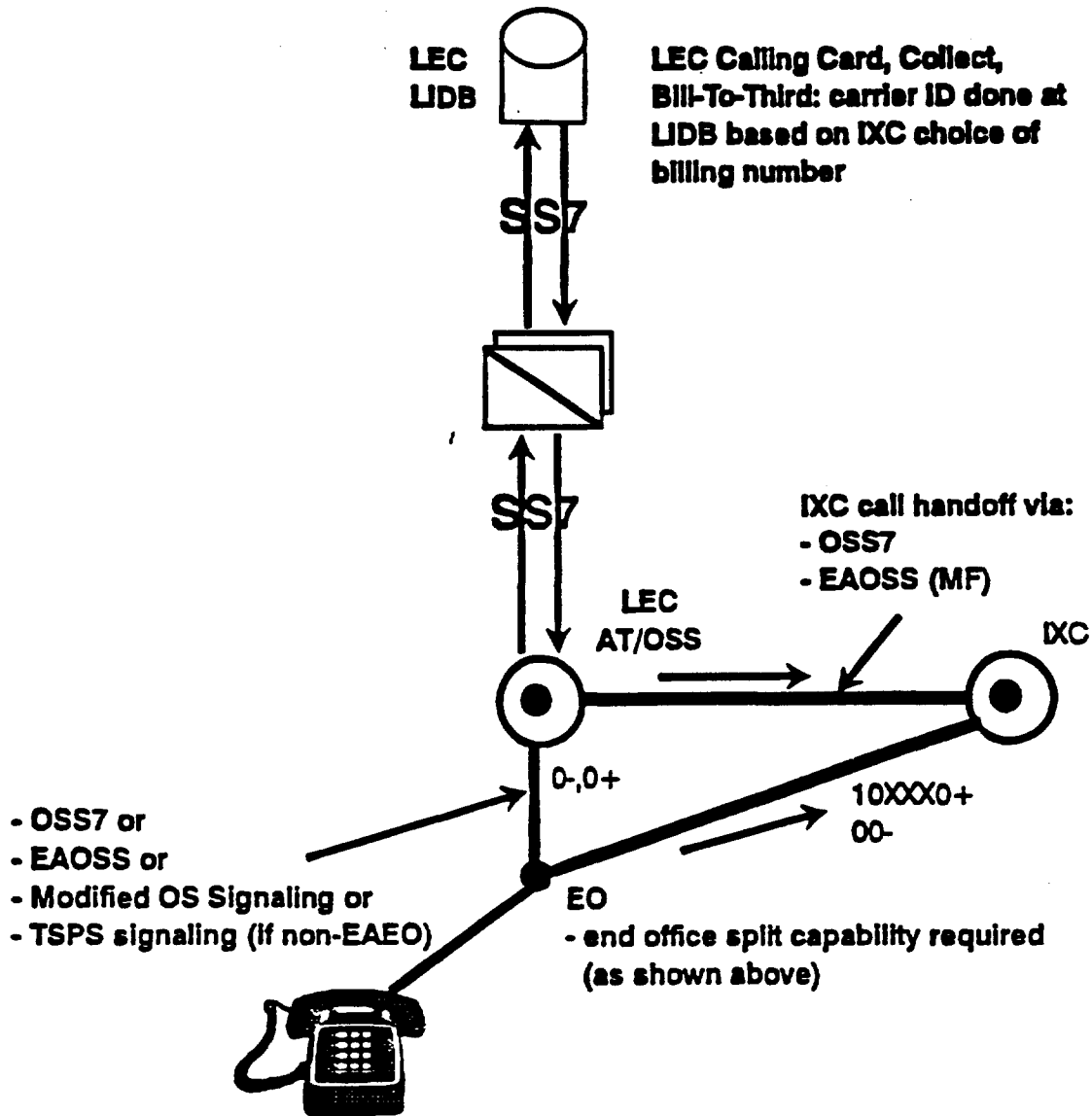
BPP SERVICE DESIGN

Summary of Dialing Plan and Carrier ID

Dialing Plan and Carrier ID

BILLED PARTY PREFERENCE

FCC
CC Docket No.
92-77



BPP Call Scenarios (InterLATA Calls):

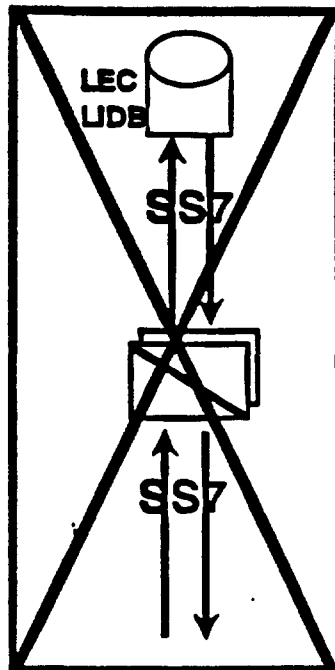
LEC Calling Card: 0+10D <BONG> NPA-NXX-XXXX-PINN

Collect: 0+10D <BONG> "collect billing information"

Bill-To-Third: 0+10D <BONG> "bill-to-third billing information"

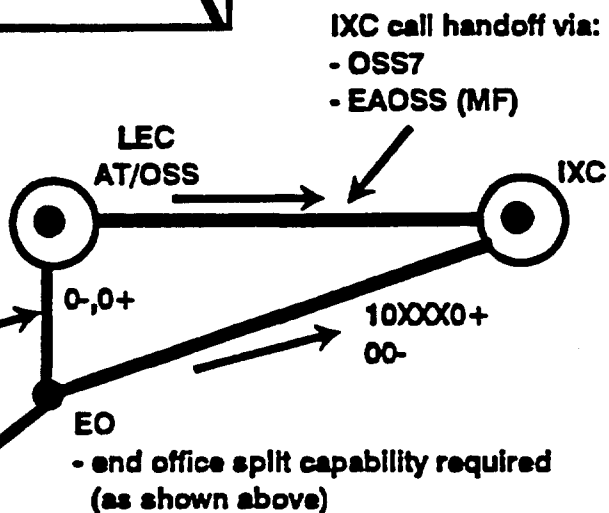
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891 & CIID: carrier ID done at OSS based on instructions from IXC card issuer

- OSS7 or
- EAOSS or
- Modified OS Signaling or
- TSPS signaling (If non-EAEO)



BPP Call Scenarios (InterLATA Calls):

891: 0+10D <BONG> 891-III-AAAAAAAAAAAA-L-PINN
CIID: 0+10D <BONG> NXX-0/1XX-XXXX-PINN

FCC
CC Docket No.
92-77



891: 0+10D <BONG> 891-III-AAAAAAAAAA-L-PINN
 CIID: 0+10D <BONG> NXX-0/1XX-XXX-PINN

BPP IXC PARTICIPATION

- **KEY SWBT ASSUMPTIONS**
 - IXC ABS Calls Are 64% of Total ABS Market
 - IXC ABS Call Mix and Automation
Acceptance Equal to SWBT Experience
- **IXC REQUIREMENTS**
 - Promote 0+ Dialing
 - Issue Cards in CLID or 891 Formats
- **SWBT SENSITIVITY ANALYSIS**
 - Declining % Access Code Dialing by all
IXCs
 - Declining % Access Code Dialing by all
IXCs except AT&T; AT&T Equal 20%
 - Declining % Access Code Dialing by all
IXCs except AT&T; AT&T Equal 50%

D. L. Little

BPP IMPLEMENTATION COSTS

- **SWBT Estimates BPP Will Require \$161M to Implement for its Service Areas (SWBT Reply Comments August 27, 1992)**
 - **Primary Non-Recurring Capital Cost Components**
 - ▲ End-Office Signaling Upgrades
 - ▲ AABS System Changes
 - ▲ Trunk Terminations and Rearrangements
 - **Primary Non-Recurring Expense Cost Components**
 - ▲ LIDB Load
 - ▲ Customer Solicitation
 - ▲ End-Office Signaling Upgrades
 - ▲ OSS Signaling Upgrades
 - ▲ OSS BPP Feature Functionality
 - ▲ AABS System Changes
 - **Primary Recurring Expense Cost Component**
 - ▲ Operator Wages

BPP COST RECOVERY

- IXC Service Participation is Critical
- Cost Recovery Structure Should Discourage Continued Access Code Dialing
- FCC has Indicated "New Service" Treatment
- Views of State Commissions are Needed

**BPP IMPLEMENTATION INTERVALS
(STANDARD CASE)**

| <u>Milestone/Activity</u> | <u>Projected Date</u> |
|---------------------------|-----------------------|
| FCC Order | 7-1-93 |
| | (18 months) |
| Vendor Trial (FOA/VO) | 1-1-95 |
| | (6 months) |

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